

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CHARLES CARL,)	
)	
Plaintiff,)	C.A. No.: 05-918
)	
v.)	
)	Trial By Jury Demanded
MBNA, AMERICA BANK, N.A.)	
)	
Defendant.)	

STIPULATED REVISED SCHEDULING ORDER

1. **Discovery.**

(a) All discovery shall be commenced in time to be completed by **May 30, 2007.**

(b) Maximum of 30 interrogatories by each party to any other party.

(c) Maximum of 30 requests for admission by each party to any other party.

(d) Maximum of 10 depositions by plaintiff and 10 by defendant.

(e) Each deposition [other than Jane Doe] limited to a maximum of 7 hours unless extended by agreement of the parties.

(f) Reports from retained experts under Rule 26(a)(2) on issues for which any party has the burden of proof due by **March 1, 2007.** Rebuttal expert reports due by **May 1, 2007.**

(g) **Discovery Disputes.** Any discovery dispute shall be submitted to the court pursuant to Fed.R.Civ.P. 37. during the course of discovery, each party is limited to **two (2)** Rule 37 motions. The court shall make itself available, however, to

resolve through a telephone conference, disputes that arise during the course of a deposition and disputes related to entry of a protective order.

2. **Summary Judgment Motions**: all summary judgment motions shall be served and filed with an opening brief on or before **July 17, 2007**. Briefing shall be pursuant to D.Del. LR 7.1.2. No summary judgment motion may be filed more than **ten (10)** days from above date without leave of the court.

3. **Applications by Motion**: Any application to the court shall be by written motion filed with the clerk. Unless otherwise requested by the court, counsel shall not deliver copies of papers or correspondence to chambers. **Any non-dispositive motion shall contain the statement required by D.Del. LR 7.1.1.**

4. **Motions in Limine**: To be scheduled by the Court after ruling on any motions for summary judgment.

5. **Pretrial Conference**: A pretrial conference will be held scheduled by the Court after ruling on any motions for summary judgment.

6. **Trial**: To be scheduled by the Court after ruling on any motions for summary judgment. For the purposes of completing pretrial preparations the parties should plan on being allocated a number of hours in which to present their respective cases.

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SO ORDERED, this _____ day of _____, 2007.

J.